CULBERTSON, WEISS, SCHETROMA AND SCHUG, P.C.
201 Chestnut Street, Suite 200
Meadville, Pennsylvania 16335
(814) 336-6400

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Voices for Independence and, Paul Pecunas; on behalf of themselves and all others similarly situated,

Plaintiffs

v.

City of Meadville, Pennsylvania,

Defendant

Civil Action No: 04-328 Erie

Hon: Sean McLaughlin, United States District Judge:

EXPLANATION OF COMPILATION OF DATA

The data contained in the reports found in Exhibits 3 and 4 were compiled and calculated using the Key for Ramp Measurement (Key) found in Exhibit 2. Because of the huge number of calculations required using the methodology of the Key, the data is shown using averages for the slope and cross slope for Top Landings and Ramps. The other data shows the actual measurement.

This type of measurement and averaging is found in the ACI Guidelines for Standard Specifications for Tolerances for Concrete Construction and Materials – 117-90, Chapter 12, Pavements, Sidewalks and Level Alignment (ACI Guidelines.)

To assist in future evaluations of the ramps, counsel for Defendant bolded measurements that exceeded the standards found in the ACI Guidelines.

Bolded percentages for the Top Landing columns for slope and cross slope means that the average of the three measurements taken for both slope and cross slope are in excess of 2.5% or one of the three measurements is in excess of 3%.

Bolded percentages for the Ramp slope column means that the average of the three measurements taken for slope is in excess of 10% or one of the three measurements exceeds 10%.

Bolded percentages for the Ramp cross slope column means that the average of the three measurements taken for cross slope is in excess of 2.5% or one of the three measurements is in excess of 3%.

Additionally, where an asterisk symbol (*) appears in the Year Paved column in Exhibit 4, Listing of Projects Completed After January 26, 1992 by PennDOT, Defendant is still working to find out the specific year that street or curb was altered.

EXHIBIT
tabbies
1